

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
ALBANY DIVISION

UNITED STATES OF AMERICA,

Plaintiff

v.

CHRISTOPHER WHITMAN,

Defendant

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CRIMINAL NO.:
1:14-CR-01(WLS)

MOTION TO WITHDRAW

COMES NOW, Leigh Ann Flynn, Attorney for Sandra Whitman-Burton, and files this Motion pursuant to Local Rule 83.1.4 of the Middle District of Georgia, and shows this Court the following:

1. Sandra Whitman-Burton has informed Attorney Leigh Ann Flynn of her desire to retain new counsel and Leigh Ann Flynn is asking permission to withdraw from the further representation of Sandra Whitman-Burton in the above styled mater.
2. Attorney Leigh Ann Flynn has discussed this matter with client and both Attorney Leigh Ann Flynn and Ms. Sandra Whitman-Burton consent to Ms. Whitman Burton obtaining new counsel.
3. Attorney Leigh Ann Flynn has notified the client as follows:
 - a. In compliance with the client's wishes, the attorney consents to withdrawing;
 - b. the Court retains its jurisdiction of this action;
 - c. the client has the burden of keeping the Court informed, respecting where notices, pleadings or other papers may be served
 - d. the client has the obligation to prepare for the hearing/trial or hire other counsel to prepare for the hearing/trial;
 - e. If the client fails or refuses to meet the above burdens, the client may suffer adverse consequences including judgment being entered against;
 - f. there is a hearing scheduled for April 20, 2016; however, Attorney has been informed client has already spoken with several attorneys she would like to hire in this matter, and the withdrawal of counsel should not adversely affect such proceeding;
 - g. service of notices may be made upon the client at the last known address of Ms. Sandra Whitman-Burton, i.e., 155 Union Lane, Doerun, Georgia 31744.

WHEREFORE, based on the foregoing, Movant requests that the Court allow her to withdraw as Attorney of Record for Sandra Whitman-Burton.

Respectfully submitted this 10th day of March, 2016.

Respectfully submitted,

MARGESON, FLYNN & ASSOCIATES, P.C.

BY: /s/ Leigh Ann Flynn
Leigh Ann Flynn
Georgia State Bar No.: 470497
Post Office Box 768
Albany, Georgia 31702
(229) 883-5350 – Telephone
laflynn@margesonlaw.com
Attorney for Sandra Whitman-Burton

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the following individuals with a copy of the Attorney Leigh Ann Flynn's Motion to Withdraw as Counsel for Sandra Whitman-Burton by depositing same in the United States Mail with sufficient postage affixed thereon to assure delivery addressed as follows:

Mr. Danial Edward Bennett
United States Attorney's Office
P.O. Box 1702
Macon, Georgia 31202-1702

Mr. Darrin L. McCullough
U.S. Department of Justice
950 Pennsylvania Avenue
Washington, D.C. 20530-0001

Ms. Sandra Whitman-Burton
155 Union Lane
Doerun, Georgia 31744

This 10th day of March, 2016.

MARGESON, FLYNN & ASSOCIATES, P.C.

/s/ Leigh Ann Flynn

Leigh Ann Flynn

GA Bar No.: 470497